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December 1, 2023

VIA ECF

Honorable Naomi Reice Buchwald
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Rina Oh n/k/a Rina Oh Amen v. Virginia L. Giuffre*
Case No.: 1-21-cv-08839 (NRB)

Your Honor:

I am the attorney for the plaintiff in the above referenced matter. This letter is respectfully submitted to the Court, on the consent of Kathleen R. Thomas, Esq. and Jill Roth, Esq., attorneys for the defendant, as a Joint Status Report for this proceeding.

As advised on the last Status Report, the parties have amicably engaged in fact discovery and expert discovery. The parties exchange of document discovery is complete. Depositions of party and non-party witnesses are complete. All independent medical examinations of the parties are complete. However certain non-party document discovery is still outstanding. One Defendant expert report has not been served, and a result depositions of the expert witnesses have not taken place. The parties are also seeking additional time to complete non-party discovery sought pursuant to subpoena. These were open issues at the time of the last status report and include Plaintiff's subpoena on a reporter who conducted a series of interviews with defendant, which are referenced in the "The Spider." Plaintiff anticipates the reporter's use of New York's shield law and "First Amendment reporter's privilege," and is limiting the issues to one quote. Other issues involve the plaintiff's Twitter accounts that are at issue in this defamation action. Despite due diligent efforts, the parties is still in the process of obtaining access to the accounts. Both of the open non-party discovery are relevant to the respective parties prima facie case and defenses.

Based on the above, the parties jointly, subject to the approval of this Honorable Court, propose the following modified deadlines:

1. Expert depositions completed by January 12, 2024;

2. Pre-motion letter shall be submitted to the Court pursuant to Your Honor's individual Court rules by January 29, 2024;
3. Any dispositive motions to be filed by March 4, 2024.
4. The parties shall submit a joint status report to the Court, regarding the case and readiness of the case for trial no later than March 11, 2024.

Thank you for your consideration.

Respectfully submitted,
/s/ Alexander Dudelson
Alexander M. Dudelson

cc:

Via ECF

Kathleen R. Thomas, Esq.

Jill Roth, Esq.